

ORIGINAL

IN THE UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

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| U.S. DISTRICT COURT NORTHERN DISTRICT OF TEXAS FILED NOV 30 2000 CLERK, U.S. DISTRICT COURT By <u>[Signature]</u> Deputy |
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STEPHEN B. JONES, LINDA D.
LYDIA and CAROLINE FRANCO,
as Texas registered voters,

Plaintiffs,

v.

GOVERNOR GEORGE W. BUSH
AND RICHARD B. CHENEY, as
candidates for President and Vice-
President of the United States of America; and
ERNEST ANGELO, GAYLE WEST,
BETTY R. HINES, JAMES B. RANDALL,
HELEN QUIRAM, HENRY W. TEICH, JR.,
WILLIAM EARL JUETT, HALLY B.
CLEMENTS, HOWARD PEBLEY, JR.,
ADAIR MARGO, TOM F. WARD, JR.,
CARMEN P. CASTILLO, CHUCK JONES,
MICHAEL PADDIE, JAMES DAVIDSON
WALKER, JOSEPH I. O'NEIL, III,
BETSY LAKE, ROBERT J. PEDEN,
JIM HAMLIN, MARY E. COWART,
SUE DANIEL, JAMES R. BATSELL,
LOYCE MCCARTER, MICHAEL DUGAS,
NEAL J. KATZ, MARY CEVERHA,
CLYDE MOODY SIEBMAN, RANDALL TYE
THOMAS, CRUZ G. HERNANDEZ,
JOHN ABNEY CULBERSON, STAN STANART,
AND KEN CLARK, Texas Electors,

Defendants.

CIVIL ACTION NUMBER
3:00-CV2543-D

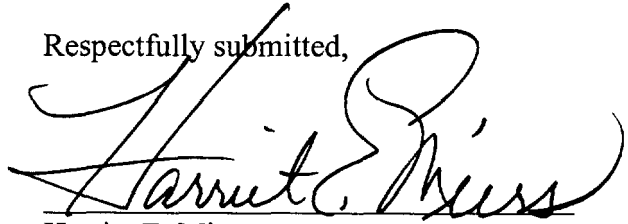
**APPENDIX TO RESPONSE AND BRIEF OF DEFENDANTS GOVERNOR
GEORGE W. BUSH AND RICHARD B. CHENEY IN OPPOSITION
TO PLAINTIFFS' PRELIMINARY INJUNCTION APPLICATION**

APPENDICES

| | | |
|----|---|------|
| 1. | Declaration of Sherry Daigle | A 1 |
| 2. | Declaration of Allie Beth Allman | A 6 |
| 3. | Declaration of William A. Kramer | A 8 |
| 4. | Certified Copy of Voting History Report Regarding Richard Bruce Cheney | A 10 |
| 5. | Certified Copy of Wyoming Driver License Identification Card Application and Temporary Driver License of Richard B. Cheney | A 12 |
| 6. | Defendant Richard B. Cheney's Response and Objections to First Combined Set of Interrogatories and Requests for Admissions to Defendant Richard B. Cheney | A 15 |

Dated: November 30, 2000.

Respectfully submitted,



Harriet E. Miers

Texas State Bar No. 000000067

Roger B. Cowie

Texas State Bar No. 00783886

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ATTORNEYS FOR RICHARD B. CHENEY

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing pleading was served upon the Plaintiffs' counsel and all other counsel of record via telecopier on this the 30th day of November, 2000.



Stacy L. Brahin

d-844925.1

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
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**STEPHEN E. JONES, LINDA D.
LYDIA, and CAROLINE FRANCO,
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Plaintiffs,

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OUTRAM, HENRY W. TEICH, Jr.,
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MARY CEVERHA, CLYDE MOODY
SIEBMAN, RANDALL TYE THOMAS,
CRUZ G. HERNANDEZ, JOHN ABNEY
CULBERSON, STAN STANART, and
KEN CLARK,**

Defendants.

CIVIL ACTION NO.

3:00-CV-2543-D

DECLARATION OF SHERRY DAIGLE

I, Sherry Daigle, hereby declare as follows:

I. I am the County Clerk of Teton County, Wyoming. Under Section 22-2-103 of the Wyoming Election Code, I am the Chief Election Officer for Teton County. I am the official charged with responsibility under Wyoming law for registering qualified voters in Teton

County.

2. In my capacity as Chief Election Officer for Teton County, I personally handled the application of Richard B. Cheney to register to vote in Teton County when he presented himself at the County Clerk's Office on July 21, 2000.

3. Under Wyoming law, an individual is only permitted to register to vote if he is a "qualified elector" as that term is defined in Section 22-1-102(a)(xxvi) of the Wyoming Election Code. That statute requires that an individual be "a bona fide resident of Wyoming." Wyoming Election Code Section 22-1-102(a)(xxx) specifies that residence is the place of a person's actual habitation. That is, residence is the place where a person has a current habitation and to which, whenever he is absent, he has the intention of returning. Wyoming law states that a person shall not gain residence in a county if he enters it without the intent of making it his current actual residence.

4. I determined on July 21, 2000 that Richard B. Cheney was a bona fide resident of Wyoming and otherwise met the requirements of a qualified elector under Wyoming law. Accordingly, I presented Mr. Cheney with the registration oath required by Wyoming Election Code Section 22-3-103, a copy of which is attached to this Declaration. Mr. Cheney executed the registration oath and I registered Mr. Cheney to vote in Teton County, Wyoming.

5. As part of the registration process, I am required by Wyoming Election Code Section 22-3-106 to present a Request for Voter Registration Withdrawal to voter registration applicants who affirm that they are already registered in another county or state. A copy of that form is attached to this Declaration.

6. On July 21, 2000, I presented Mr. Cheney with a Request for Voter

Registration Withdrawal form. Mr. Cheney executed that form, which serves as his formal request that his previous voter registration be withdrawn.

7. As required by Wyoming Election Code Section 22-3-106, I mailed Mr. Cheney's executed Request for Voter Registration Withdrawal form to the registry agent in the State of Texas where Mr. Cheney had last been registered.

28 U.S.C. § 1746 Declaration

I declare under penalty of perjury that the foregoing statements are true and correct.

Executed on this 29th day of November 2000.



Sherry Daigle
Sherry Daigle

REQUEST FOR VOTER REGISTRATION WITHDRAWAL
(W.S. 22-3-106)

I, _____, having now registered to vote in the county
(Please Print) _____, State of Wyoming, hereby request that my registration to vote
in the county of _____, State of _____ be withdrawn.
My previous address was: _____ Street or RFD
_____ City and Zip Code

Birth Date _____

Signature of Requester
(Name as it appears on registry list)

Subscribed and sworn to before me this _____ day of _____, 19 _____

Name of person receiving request

Title

Prepared by Secretary of State

—DETACH HERE BEFORE MAILING—

INSTRUCTIONS TO:

- County Clerk** —Mail withdrawal form to county clerk where voter was last registered,
or if the voter was last registered in another state, mail the form to the
appropriate Secretary of State.
City Clerk —Send the form to your county clerk.

LAST NAME

FIRST NAME

MIDDLE NAME OR INITIAL

DISTRICT

PRECINCT

STATE OF WYOMING ss.
COUNTY OF TETON

REGISTRATION OATH

PLEASE PRINT

Sen. _____ Leg. _____ Sch. _____

I, _____, do solemnly swear (or affirm) that I am a citizen of the United States; that I was born on _____; that I have been a bona fide resident of the State of Wyoming, County of Teton since _____, that my present residence address is _____, City of _____; Election District No. _____, and Polling Precinct No. _____, and Ward _____ (if applicable); that my mailing address (if different from my residence address) is _____; that I am a member of _____ political party and my social security number (optional) is _____; that I am/am not _____ now registered in another county or state; that I am not currently adjudicated a mentally incompetent person, that I have not been convicted of a felony, or if I have been convicted of a felony, I have had my rights restored by a competent authority; and that the voter registration information contained herein is true and accurate to my best knowledge and belief.

Birthplace _____
City/State _____

(Signature in full of applicant)

Subscribed and sworn to me by _____ this _____ day of _____ 20 _____.

Signature and title of registry agent or person authorized to administer oaths

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LYDIA, and CAROLINE FRANCO,
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Plaintiffs,

v.

GEORGE W. BUSH, RICHARD B.
CHENEY, ERNIE ANGELO,
GAYLE WEST, BETTY R. HINES,
JAMES B. RANDALL, HELEN
QUIRAM, HENRY W. TEICH, Jr.,
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MARY CEVERHA, CLYDE MOODY
SIEBMAN, RANDALL TYE THOMAS,
CRUZ G. HERNANDEZ, JOHN ABNEY
CULBERSON, STAN STANART, and
KEN CLARK,

Defendants.

CIVIL ACTION NO.

3:00-CV-2543-D

DECLARATION OF ALLIE BETH ALLMAN

I, Allie Beth Allman, hereby declare as follows:

1. I am a licensed real estate broker in the State of Texas. I am making this
declaration based on my personal knowledge.

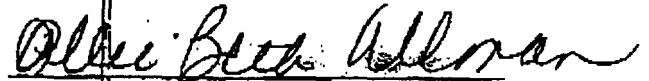
2. I served as the listing agent for the sale by Mr. and Mrs. Richard B. Cheney of the real property and improvements commonly known as 3812 Euclid Avenue, Highland Park, Texas ("Property"). The Property has been sold and the transaction of sale has been closed and funded.

3. Mr. and Mrs. Richard B. Cheney no longer own the Property.

28 U.S.C. § 1746 Declaration

I declare under penalty of perjury that the foregoing statements are true and correct.

Executed on this 30th day of November 2000.


Allie Beth Allman

**IN THE UNITED STATES DISTRICT COURT
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LYDIA, and CAROLINE FRANCO,
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Plaintiffs,

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CIVIL ACTION NO.

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COWART, SUE DANIEL, JAMES R.
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SIEBMAN, RANDALL TYE THOMAS,
CRUZ G. HERNANDEZ, JOHN ABNEY
CULBERSON, STAN STANART, and
KEN CLARK,**

Defendants.

3:00-CV-2543-D

DECLARATION OF WILLIAM A. KRAMER

I, William A. Kramer, hereby declare as follows:

I. I am the Chairman of Republic Title of Texas, Inc. I served as escrow officer for the sale by Mr. and Mrs. Richard B. Cheney ("Sellers") of the real property and improvements commonly known as 3812 Euclid Avenue, Highland Park, Texas ("Property").

2. As an agreed condition of the sale, Sellers assumed responsibility for the payment of all *ad valorem* property taxes for calendar year 2000.

3. I am the individual responsible for calculating the amount to be paid into tax escrow for the payment of the property taxes described above. The amount calculated and paid into escrow (\$38,835.14) represents the amount of property taxes due on the Property for calendar 2000 without any claim on behalf of Sellers for a "homestead exemption" with respect to the Property.

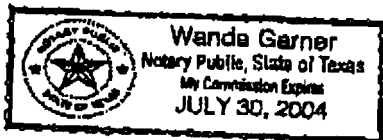
28 U.S.C. § 1746 Declaration

I declare under penalty of perjury that the foregoing statements are true and correct.

Executed on this 30th day of November 2000.

William A. Kramer
William A. Kramer

Sworn to and subscribed before me the undersigned authority on this 30th day of November, 2000, by WILLIAM A. KRAMER.



Wanda Garner
Notary Public, State of Texas

12:17:43

VOTING HISTORY REPORT

RICHARD BRUCE CHENEY

Registered Address : 3812 EUCLID

DALLAS TX 75205

Voter-ID: 02478867 Registered: 12-04-1995 Status: Canceled - Registered Elsewh

B4 POLL X 1227
11/03/1998 GOVERNOR/CITY COP
89 POLL X 1196
11/05/1996 PRESIDENTIAL

State of TEXAS
County of DALLAS

I, Bruce Sherbet, Elections Administrator, hereby certify
the foregoing to be a true and correct copy of the voting record
of RICHARD BRUCE CHENEY as it appears on record in my office.

Witness my hand and seal on November 28, 2000.

Bruce Sherbet
Elections Administrator

By: 
Deputy

DI-02478861
REQUEST FOR VOTER REGISTRATION WITHDRAWAL
(W.S. 22-3-106)

I, RICHARD B. CHENEY, having now registered to vote in the county
of JEFFERSON, State of Wyoming, hereby request that my registration to vote
in the county of DALLAS State of TEXAS be withdrawn.
My previous address was: 3212 ENCLIB AVE Street or RFD
DALLAS, TEX 75225 City and Zip Code

JAN. 20, 1941
Birth Date

Richard B. Cheney
Signature of Requester
(Name as it appears on Registry file)

Subscribed and sworn to before me this 21st day of July, 2000.



Sharon K. Rothermel
Name of person receiving request

Dep. Clerk
Title

Prepared by Secretary of State

THE STATE



OF WYOMING

Jim Geringer, Governor

Sleeter C. Dover, Esq., Director

Department of Transportation

5300 BISHOP BOULEVARD

CHEYENNE, WYOMING 82009-3340

November 29, 2000

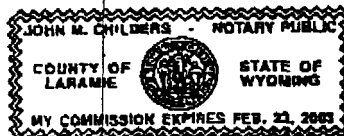
I, Dennis M. Coll, Senior Assistant Attorney General of the State of Wyoming, state that attached hereto is a true and correct copy of Richard B. Cheney's July 21, 2000, Wyoming Driver License Identification Card Application and copy of his Temporary Driver's License issued the same date.

Handwritten signature of Dennis M. Coll in cursive script.

Dennis M. Coll

Handwritten signature of John M. Childers in cursive script.

Notary



Wyoming Driver's License/Receipt
Valid for 60 Days. Not for ID purposes

11563900203308300

NAME: CHENEY, RICHARD BRUCE

SERVICE OFFICE: 0002-45951

ADDRESS: 4205 GREENS PLAGE

USER ID: WTD Burkhardt

WILSON, WY 83014

SERVICE DATE: 07/21/2000 08:32:58

TYPE OF SERVICE: O-FIRST

OPERATOR NUMBER: 100539-968

FEE: 20.00

CLASS: C

ENDORSEMENTS:

BIRTHDATE: 01/30/1941

SOCIAL SECURITY: - -

TRANSACTION NUMBER:

SEX: Male **HT:** 5'10" **WT:** 210 **HAIR:** Brown **EYES:** Blue

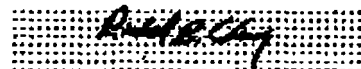
000066177-00-0006

RESTRICTION CODES: B

AD_NUMBER:

ISSUE DATE: 07/21/2000 **EXPIRATION DATE:** 01/30/2005

03281474



Mailed 7-27-00 es.

WYOMING DRIVER LICENSE IDENTIFICATION CARD

To be completed by all applicants in black ink



Print:
 Last Name: CHENEY (First) RICHARD (Middle) BRUCE
 Mailing Address: 4205 GREENS PLACE WILSON WYD 83014
 Residential Address: 4205 GREENS PLACE WILSON WYD 83014
 Date of Birth: 1/30/41 Phone: (307) 739-2444
 Social Security Number: _____ Do you want your SSN to show on your license? ☒ YES ☐ NO
 1. Are you a United States Citizen? ☒ YES ☐ NO Place of Birth: LINCOLN NEBR USA
 2. Are you a Wyoming Resident? ☒ YES ☐ NO If no, are you: ☐ Active-Duty Military ☐ Fulltime WY College Student
 3. Has your current driver license or identification card been: ☐ lost? ☐ stolen? ☐ taken by law enforcement? ☐ n/a
 4. Is your privilege to drive currently suspended, cancelled, revoked or denied in this or any other state? ☐ YES ☒ NO
 5. Do you wish to be an organ donor? ☐ YES ☒ NO (Applicant must be at least 18 years of age)
MEDICAL HISTORY
 6. Do you have paralysis and/or missing limbs? ☐ YES ☒ NO
 If yes, please describe: _____
 7. Have you lost consciousness, due to a seizure, stroke, or insulin shock, within the previous five (5) year period?
☐ YES ☒ NO If yes, what caused the loss of consciousness? _____
 List any physical or mental conditions you have other than Corrective Lenses: _____

APPLICANTS FOR COMMERCIAL CLASS LICENSES & NON-COMMERCIAL CLASS "A" & "B" ONLY

8. Are you applying for a Commercial Driver License (CDL) and subject to Part 391 of the Federal Motor Carrier Safety Regulations? ☐ YES ☒ NO If exempt, what is your occupation? _____
 9. Do you possess a valid Federal DOT Medical card? ☐ YES ☒ NO Expiration Date: _____
 10. Are you being treated for: ☐ Epilepsy? ☒ Heart Disease? ☐ Insulin Dependent Diabetes? ☐ High Blood Pressure?
 11. Do you consent to the release of your personal information by the Wyoming Department of Transportation for bulk distribution surveys, marketing or solicitations? ☐ YES ☒ NO

NOTE: Personal information means information that identifies a person, including an individual's photograph or computerized image, signature, social security number, driver identification number, name, address, telephone number, and medical or disability information.

I hereby authorize the release of my driving record to authorized recipients. I hereby certify under penalties of law, that the above information is true and correct. Use of a false or fictitious name or knowingly making a false statement or concealing a material fact in this application may result in a fine or imprisonment or both, and the cancellation of your Wyoming driver license/identification card.

Applicant's Signature: Richard B. Cheney Date: July 21, 2000
 Minor's Release: I hereby certify under penalties of law, that I am the legal parent/guardian having custody of the minor and hereby verify that the above information is true and correct. Date: _____

VISION SCREENING (to be completed by Examiner or Vision Specialist)

Visual Acuity: Right 20/25 Left 20/25 Both 20/25 Corrective Lenses/Contacts? ☒ YES ☐ NO
 Depth Perception? ☒ YES ☐ NO Horizontal Field of Vision: Right Eye: 85 degrees Left Eye: 85 degrees
 Signature of Vision Specialist/Examiner: [Signature] Date of Exam: 07/21/00

COMMENTS/RESTRICTIONS:

EXAMINER'S USE ONLY
 MVID: 10-33513
 Application Document/Document Number/State: WYOMING DRIVER LICENSE
 Applicant's Driver License or Identification Number: [Number] State/Issue Date: CTR
 Surrendered driver license/ID for invalidation: ☐ YES ☐ NO Class/Endorsement applied for: C Service: PERM
 Clearance Verification: ☒ CDLIS ☐ RDP ☐ EMD ☐ NOT ☐ RIS ☐ Clear ☐ Not Clear ☐ Attachment
 Change of Name, DOB & SSN from previous: ☐ YES ☐ NO If yes, what changed? _____
 TESTING: Written: ☒ Rules of the Road ☐ Motorcycle ☐ Sign/Ctrl. Form: _____ Score: _____
 Skills: ☐ Regular Skills ☐ Advanced Skills ☐ Pre-Exam ☐ Invert: _____ Score: _____
 COMMENTS: ADDITIONAL DRIVER LICENSES ON WY
 Signature of Examiner: [Signature] Date: 07/21/00

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SIEBMAN, RANDALL TYE THOMAS,
CRUZ G. HERNANDEZ, JOHN ABNEY
CULBERSON, STAN STANART, and
KEN CLARK,

Defendants.

CIVIL ACTION NO.

3:00-CV-2541-D

**DEFENDANT RICHARD B. CHENEY'S RESPONSE AND OBJECTIONS TO
FIRST COMBINED SET OF INTERROGATORIES
AND REQUESTS FOR ADMISSIONS TO DEFENDANT RICHARD B. CHENEY**

Pursuant to Rules 26, 33, and 36 of the Federal Rules of Civil Procedure, and this
Court's Order of November 27, 2000, Defendant Richard B. Cheney ("Respondent") hereby
responds to Plaintiffs' First Combined Set of Interrogatories and Requests for Admissions.

- Page 1

GENERAL OBJECTIONS

A. Respondent objects to each Request and Interrogatory that seeks information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege.

B. Respondent objects to each instruction, definition, Request, and Interrogatory to the extent that it seeks to impose on him any obligations or responsibilities other than those mandated by the Federal Rules of Civil Procedure or the Rules or Orders of this Court.

C. Respondent objects to each Request and Interrogatory because they seek information that is not reasonably calculated to lead to admissible evidence relevant to the ultimate fact issue in this case: that is, will Respondent be an inhabitant of the State of Texas on December 18, 2000 at the time the defendant Texas Electors cast their ballots for President and Vice President of the United States?

D. Respondent objects to each Request and Interrogatory on the grounds that this is a non-justiciable controversy, brought by plaintiffs wholly lacking in standing.

E. The objections stated above are hereby incorporated by reference to each and every instruction, definition, Request, and Interrogatory.

F. The responses hereto have been provided on twenty-four hours notice. They are made to the best of the Respondent's knowledge, information and belief at a time in which he has been charged with the responsibility to supervise the transition of government in Washington. Accordingly, he reserves the right to amend any answers if time permits and additional, material information comes to light.

INTERROGATORIES

Interrogatory No. 1

Identify by name of state and dates of inhabitation every state of which you contend you have been an inhabitant at any time during the time period January 1, 1996 to the present.

ANSWER:

Respondent objects to Interrogatory No. 1 to the extent that the term "inhabitation" is not defined. Notwithstanding and without waiving said objection, Respondent states that he maintained a residence and was employed in the State of Texas from January 1996 to July 2000. On or about July 21, 2000, Respondent declared his intention to return to his home state of Wyoming. Respondent thereafter registered to vote in the State of Wyoming, obtained his driver's license in that state and put his Texas residence up for sale.

Interrogatory No. 2

If you have changed the state of your inhabitation since January 1, 1996, please state all facts upon which you rely to support your allegation that you are/were an inhabitant of the subsequent state(s).

ANSWER:

Respondent objects to Interrogatory No. 2 to the extent it fails to define "inhabitation." Respondent further objects to this "contention interrogatory" to the extent that it purports to reverse the role and burdens of persuasion placed upon plaintiffs and defendants in this case. It is the plaintiffs who have made "allegations." Respondent has moved to dismiss on the grounds that the controversy is not properly before this Article III Court. Notwithstanding and without waiving said objections, material facts relevant to any factual inquiry include:

- (i) Respondent is registered to vote in the State of Wyoming and has voted in two elections in Teton County since July 2000.
- (ii) Respondent holds a driver's license issued by the State of Wyoming. At the time he obtained his license the State of Wyoming invalidated his previous license, which was issued by the State of Texas. The Texas license was perforated with the word "VOID" and is now unusable.
- (iii) On or about July 25, 2000, Respondent was requested by the United States Secret Service to designate his primary residence for purposes of Secret Service protection. He designated his home in Jackson Hole, Wyoming.
- (iv) Respondent retired from the Halliburton Corporation on August 16, 2000. Since his retirement, he has not been employed in the State of Texas.
- (v) During Respondent's tenure at Halliburton, he maintained a house in Dallas, Texas. Since August 2000, the house has been shown for sale both privately and publicly. The house is currently under a contract for sale.

Interrogatory No. 3

[As modified by the court:] Identify (by type of vehicle, make and model) all vehicles (automobiles, boats, motorcycles) currently owned or leased by you and for each:

- a) identify the state(s) in which such vehicle(s) have been registered by (or on behalf of) you;
- b) identify the date(s) of registration of each vehicle in each state; and,
- c) state the physical location (by city and state) of each such vehicle during the past thirty days.

ANSWER:

Respondent has a lease and/or ownership interest in the following vehicles:

- One Mercedes-Benz automobile registered in the State of Virginia in 1997. This automobile has been located in and around the State of Virginia and Washington, D.C. during the past thirty days.
- One Jeep Cherokee registered in the State of Wyoming in 1998. This automobile has been located in the State of Wyoming during the past thirty days.
- One Lexus automobile registered in the State of Texas in 1996. This automobile has been located in the State of Colorado since on or about November 11, 2000.
- One Cadillac automobile registered in the State of Texas in 1995. This automobile has been located in the State of Texas during the past thirty days.

Interrogatory No. 4

Identify all states in which you have held a driver's license within the past one year and the dates you held such license(s).

ANSWER:

Respondent has held drivers' licenses in the State of Texas and Wyoming. Respondent obtained his Wyoming driver's license on or about July, 21, 2000 at which time his Texas license was invalidated and perforated with the word "VOID." Respondent's Wyoming license is the only valid license he currently possesses.

Interrogatory No. 5

[As modified by the court:] State the billing address for each credit card issued personally to you for the time period January 1, 2000 through November 27, 2000.

ANSWER:

Credit card statements are delivered to Respondent's former assistant at Halliburton. Since July 2000, the statements have been forwarded to Respondent in Virginia, Wyoming and

on the campaign trail. As noted, the assistant is currently relocating to Washington, D.C. and the billing address for credit card statements will be changed accordingly.

Interrogatory No. 6

[As modified by the court:] State the mailing address for each magazine to which you personally subscribed during the time period January 1, 2000 through November 27, 2000.

ANSWER:

Magazines have been delivered to Respondent's house in Dallas, former office at Halliburton and to his townhouse in McLean, Virginia.

Interrogatory No. 8

State the address listed on your personal income tax return for the tax year 1999.

ANSWER:

500 North Akard Street
#3600
Dallas, Texas 75201

Interrogatory No. 9

State your address listed on your quarterly estimated tax payment (Form 1040-ES) due September 15, 2000.

ANSWER:

None. No such form was filed.

Interrogatory No. 10

State all reasons you terminated your employment with Halliburton.

ANSWER:

Respondent retired from the Halliburton Corporation to accept the nomination of the Republican Party to run for the office of Vice President of the United States.

Interrogatory No. 11

Identify the date you "re-registered to vote in Wyoming."

ANSWER:

Respondent re-registered to vote in the State of Wyoming on or about July 21, 2000.

Interrogatory No. 14

[As modified by the court:] Identify all real property in which you own an interest including, without limitation, description, address, city, county, state.

ANSWER:

Respondent holds interests in a home in Jackson Hole, Wyoming; a house in Highland Park, Texas; a townhouse in McLean, Virginia; and an undeveloped lot in McLean, Virginia.

REQUESTS FOR ADMISSIONS

Request for Admission No. 1

As of November 27, 2000, you had not, nor had anyone on your behalf, notified the Chief Appraiser of the Dallas Central Appraisal District in writing that your right to a homestead exemption on your home located at 3812 Euclid Avenue, Highland Park, Texas, had ended.

RESPONSE:

Admitted. Notice of a change in entitlement to the homestead exemption is not required to be filed until May 2001.

Request for Admission No. 2

[As modified by the court:] During the time period January 1, 2000 and November 27, 2000, you did not file a change-of-address form with the United States Post Office.

RESPONSE:

Admitted in part and denied in part. In July 2000, the U.S. Postal Service was notified to rescind a previous order on file in Teton County, Wyoming to forward Respondent's mail to Dallas, Texas. Additionally, since July 2000, mail directed to respondent in Texas was delivered to or otherwise collected by a former assistant who has routinely forwarded it to Respondent in Virginia, Wyoming or on the campaign trail. The assistant is in the process of relocating to Washington, D.C. and further instructions will be filed shortly with the U.S. Postal Service.

Request for Admission No. 3

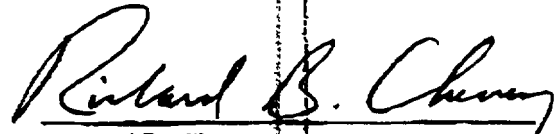
You have publicly referred to your house in Jackson Hole, Wyoming as a "vacation home" or words to that effect.

RESPONSE:

Respondent has no current recollection of referring to his residence in Jackson Hole as his vacation home.

28 U.S.C. § 1746 Declaration

I declare under penalty of perjury that the foregoing statements of fact that are contained in the responses to interrogatories are true and correct. Executed on this 29th day of November 2000.


Richard B. Cheney

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing pleading was served upon the
Plaintiffs' counsel and all other counsel of record via telecopier on this the 29th day of November,
2000 at 9:00 a.m.

Stacy L. Brainin